

accessing a link for a particular application role constitutes "selection of a specific software unit" as recited in claim 29. In other words, by accessing a particular link, the user is making a selection of the software unit with which that link is associated.

Accordingly, it is respectfully submitted that the specification provides both a written description and an enabling disclosure of the subject matter recited in claim 29, and its dependent claims 30-37. Reconsideration and withdrawal of the rejections under 35 U.S.C. § 112 are respectfully requested.

Claims 29-37 were also rejected under 35 U.S.C. § 101, on the grounds that the claimed subject matter "lacks patentable utility." The rejection characterizes the subject matter of the claim as "simple display of information [that] is merely non-functional descriptive material." It is respectfully submitted that the claims do not merely recite the simple display of non-functional descriptive material. Rather, the claims also recite the *functionality* of the claimed graphical user interface that results in the display of information. Specifically, claim 29 recites that the GUI mechanism displays a plurality of devices to a user "responsive to selection of a specific software unit." In other words, the claim recites not only the particular information that is displayed, but also the mechanism by which it is caused to be displayed. As such, it is respectfully submitted that the claim is not directed to "merely" non-functional descriptive material. Rather, it recites a concrete, tangible and useful result.

Furthermore, it is to be noted that claim 37 recites that the graphical user interface includes "means for deprecating said specific software unit." This claim recites further functionality, and not merely the simple display of information.

Reconsideration and withdrawal of the rejection is respectfully requested.

The Office Action maintains the rejections of all pending claims on the basis of prior art. In so doing, the Action presents a brief synopsis of Applicants' previous arguments, and responses thereto. It is respectfully submitted that this synopsis does not fully take into

account all of the arguments presented by Applicants. Furthermore, the responses do not demonstrate that the cited references teach the *claimed* subject matter.

Claim 1 recites a graphical user interface having a first user interface element "via which a user can select one of said plurality of customers". The claim further recites that the graphical user interface includes at least one GUI mechanism which, when actuated, causes a screen to be displayed "that lists only those software entities that are associated with the *selected one* of said plurality of said customers...." The rejection of this claim relies upon a combination of the Dean et al and Cantos et al patents. The Office Action acknowledges that the Dean patent does not disclose a graphical user interface that displays only those software entities that are associated with a selected one of a plurality of customers. To this end, therefore, the rejection relies upon the Cantos patent, which it characterizes as disclosing that it was known to provide packages/software based upon association with a specific customer.

It is respectfully submitted, however, that the Cantos patent does not contain any disclosure that suggests the claimed subject matter to a person of ordinary skill in the art. Rather, that patent is directed to an entirely different mechanism for providing software updates to customers. More particularly, the claimed graphical user interface of the present invention provides a centralized mechanism via which a network manager can access the appropriate software for a particular customer in a heterogeneous environment, and take appropriate action with respect thereto. In contrast, the Cantos patent discloses a system in which information about available software is transmitted to the end users. See, for example, column 8, lines 55-58, cited in the Office Action. Since the actions of determining which new software packages are available, and sending information about those packages to the end users are carried out automatically, there is no need for a graphical user interface via which a network manager can select a particular customer, and display a list of only those software entities that are associated with the selected customer.

Accordingly, even if the Cantos patent is interpreted to disclose the general concept of associating customers with software packages, as alleged in the Office Action, it does not contain any teaching that would lead a person of ordinary skill to modify the system of the Dean patent in a manner that would result in the claimed subject matter. Specifically, there is no disclosure of a user interface element via which a user can select one of a plurality of customers, and a GUI mechanism that can be actuated to add a new software group and causes a screen to be displayed that lists on those software entities that are associated with the selected customer.

Claims 29-37 were rejected under 35 U.S.C. § 103 as being unpatentable over the Fitzgerald et al patent. As pointed out in Applicants' previous response, claim 29 recites a GUI mechanism that is responsive to selection of a specific software unit for displaying "a plurality of devices... on which said specific software is installed." In contrast, the Already Have (AH) lists of the Fitzgerald patent, cited in the rejection, do not provide an indication of a plurality of devices on which a specific software unit is installed. In response to this argument, the Office Action states that Fitzgerald's list "clearly indicate a plurality of devices", with reference to column 7, lines 55-59. The support for this statement is not apparent. The cited portion of the patent states "Individual Already Have (AH) lists can be stored or can be produced at configuration time for *individual* distributed computers". Throughout this portion of the patent, it refers to AH lists for "individual" computers.

In essence, the AH lists are the *opposite* of the subject matter recited in claim 29. Specifically, claim 29 recites that the GUI mechanism is responsive to the selection of a "specific software unit" for displaying "a plurality of devices" on which the specific software unit is installed. Thus, for a *given* software unit, the claimed subject matter displays a *plurality* of devices. In contrast, an AH list of the Fitzgerald patent is associated with a *given*, i.e. individual, computer, or device and displays all the resources, e.g. software programs, resident on *that* device. In other words, the claimed subject matter displays a one-to-many

relationship between software unit and devices, whereas the AH list of the Fitzgerald patent present a many-to-one relationship between software and computers.

Accordingly, it is respectfully submitted that the cited portions of the Fitzgerald patent cannot be interpreted to suggest the subject matter of claim 29, or any of its dependent claims.

In view of the foregoing, it is respectfully submitted that all pending claims are patentably distinct from the cited references. Reconsideration and withdrawal of the rejections are respectfully requested.

Respectfully submitted,

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